## RIMON P.C.

Proposed Counsel to Kenneth P. Silverman, Esq., the Chapter 7 Trustee 100 Jericho Quadrangle, Suite 300 Jericho, New York 11753 (516) 479-6300 Brian Powers

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re: Chapter 7
Case No: 24-11860 (JLG)

GENERALHEALTH GROUP, INC.,

Debtor. -----x

## TRUSTEE'S APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING THE EMPLOYMENT OF RIMON P.C. AS ATTORNEYS FOR THE TRUSTEE

By this application (the "<u>Application</u>"), Kenneth P. Silverman, Esq., the chapter 7 trustee (the "<u>Trustee</u>") of the bankruptcy estate (the "<u>Estate</u>") of GeneralHealth Group, Inc. (the "<u>Debtor</u>"), seeks the authority to employ Rimon P.C. ("<u>Rimon</u>") as counsel to the Trustee, and respectfully represents:

- 1. On October 29, 2024, the Debtor filed a voluntary petition for relief under chapter 7 of Title 11, United States Code (the "Bankruptcy Code") in the United States Bankruptcy Court for the Southern District of New York (the "Court").
- 2. By Notice of Chapter 7 Bankruptcy Case dated October 29, 2024, Kenneth P. Silverman was appointed as the interim Chapter 7 Trustee [ECF Doc. No. 4]. The Trustee has since duly qualified, and is, the permanent Trustee in this case.
- 3. The Trustee has determined that he requires the assistance of Rimon to assist in, among other things: (i) with the Trustee's investigation of the Debtor's financial affairs, including the possible liquidation of accounts receivables, (ii) the pursuit of the recovery of any assets of the Debtor's estate and/or avoidance claims on behalf of the Debtor's estate; and (iii) the orderly

administration of this estate, including the preparation of the necessary motions, applications, orders, and other legal documents that may be required under the Bankruptcy Code and the Federal Rules of Bankruptcy Procedure in furtherance of the Trustee's appointment (collectively, the "Services").

- 4. Accordingly, the Trustee requests that Rimon be employed as his attorneys effective as of January 1, 2025. The Trustee believes that Rimon is well qualified to act as his attorneys and to represent him as the Trustee in this case.
- 5. In addition to the Services, Rimon may render other professional services and perform all other legal services for the Trustee, which may be necessary in connection with the Trustee's administration of the Debtor's estate, including but not limited to, the Trustee's attempts to recover and liquidate the assets of this estate.
- 6. To the best of the Trustee's knowledge, Rimon has no connection with the Debtor's creditors or any other party in interest or their respective attorneys, except as set forth in the attached declaration of Brian Powers, Esq. (the "Declaration"). Additionally, Rimon represents no interest adverse to the Debtor or this estate, or any other interested person in the matters with respect to which Rimon is being employed by the Trustee, except as set forth in the Declaration.
- 7. Furthermore, Rimon is a "disinterested person" as that term is defined in §101(14) of the Code and that said firm:
  - (a) is not a creditor, equity security holder, or insider;
- (b) is not and was not, within two (2) years before the date of the filing of the petition, a director, officer, or employee of the Debtor; and

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(c) does not have an interest materially adverse to the interest of this estate or

of any class of creditors or equity security holders, by reason of any direct or indirect relationship

to, connection with, or interest in, the Debtors, or for any other reason.

8. Based on the foregoing, the Trustee submits that the retention of Rimon, as of

January 1, 2025, is not only necessary but also in the best interest of this estate.

9. No prior application for relief sought herein has been previously made to this or any

other court.

WHEREFORE, the Trustee respectfully requests the entry of the annexed order

authorizing the retention of Rimon P.C., and that the Court grant such other and further relief as

may be deemed just and proper.

Dated: Jericho, New York

February 18, 2025

s/Kenneth P. Silverman

Kenneth P. Silverman, Esq.